The Secretary  
Invasive Plants and Animals Committee  

14 October 2016  

Submission on the draft Australian Pest Animal Strategy  
The Invasive Animals Cooperative Research Centre (IACRC) welcomes the opportunity to provide a submission in relation to the consultation draft Australian Pest Animal Strategy. The IA CRC is Australia’s largest collaborative pest animal research, development and extension initiative comprising 27 government, industry, business and research partners. Its purpose is to counteract the impact of invasive animals through the application of new technologies and by integrating approaches across agencies and jurisdictions.  

General Comments  
- The IA CRC commends IPAC on this national strategy, its framework, and scope to emphasise action across the invasion curve.  
- The Strategy requires strengthening to make its priority action program more explicit. This can be achieved by the inclusion of a set of 5 year targets (the Threatened Species Strategy provides a useful model in this regard), an evaluation section that sets out the metrics that will be used (eg. national targets) to transparently assess achievements delivered through the Strategy.  
  - National targets could include adoption of agreed pests of national significance (eg. Established Pests of National Significance),

Specific Comments  

Figure 2. Generalised Invasion Curve  
The economic returns for asset-based protection should include an additional figure on the return on investment in biocontrol, such as rabbit biocontrol, which over 30 years is in the order of 1:100+.

Priority 1.3 Maintain and enhance long-term research, development and extension capacity and capability  
Innovation in pest animal management is a critical priority of the APAS. To ensure coordinated research and innovation effort requires enduring national institutions that can foster and synergise government and industry capability dispersed around the nation and overseas. Building sufficient critical mass to enable innovation across the invasion curve is best achieved through collaborative R&D institutions, notably the Invasive Animals CRC and its successor body – the Centre for Invasive Species Solutions.  
The important role filled by the IA CRC was recognised in the independent evaluation of the APAS, which concluded that:  
“Options available to manage pest animals were reported to have been improved over the last five years, in a large part due to the Invasive Animals CRC” (Community Solutions 2013,i).
Amend title by inserting: ‘collaborative’ so that it reads: ‘Maintain and enhance long-term collaborative research and development and extension capacity and capability.

**Recommendation**
Add new second paragraph to highlight that national collaboration is a key to major pest animal management innovation as found by the independent APAS review.

Research and innovation has been greatly enhanced through national collaborations, particularly through the Invasive Animals Cooperative Research Centre. This important government, industry, business collaboration will be continued through a successor institution – the Centre for Invasive Species Solutions (CISS). An enduring national institution is critical to ensuring an ongoing pipeline of new management innovations are delivered and that there is long term support for biocontrol and other research that has long lead times.

If you have any queries, please do not hesitate to contact me.

Yours faithfully

Andreas Glanznig
Chief Executive
Case Study: Delay in obtaining national regulatory approval for new wild dog and fox PAPP technology

Animal Control Technologies (Australia) (ACTA), Australian Wool Innovation (AWI) and the Australian Government through the Invasive Animals CRC, have made major R&D investment to enable registration of PAPP (para-aminopropiophenone) and two bait products containing PAPP for wild dog and fox control in Australia. PAPP is the first new wild dog and fox toxin registered for use in 50 years, and is designed to complement regional 1080 based baiting programs.

PAPP was approved for use by the APVMA on 21 January 2016 and PAPP products are currently legally available in only two States, under the ACTA product names DOGABAIT and FOXEXECUTE®. This lag in achieving national (ie Commonwealth and State) regulatory approval is further highlighted given that the APVMA public release summary of its evaluation of DOGABAIT and FOXEXECUTE® was released in October 2015.

Based on current trends it is unlikely that these innovative new wild dog and fox baits will be available in all mainland States before the end of 2016 – almost 12 months from APVMA approval.

Bait availability in each State or Territory is subject to the same controls as 1080 baits (Restricted S7 classification), as follows:*

<table>
<thead>
<tr>
<th>State</th>
<th>Access</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>NSW</td>
<td>Local Land Services</td>
<td>Awaiting PAPP Pest Control Order being issued by NSW Government</td>
</tr>
<tr>
<td>NT</td>
<td>Accredited Rural Merchants</td>
<td>Awaiting confirmation from NT government</td>
</tr>
<tr>
<td>QLD</td>
<td>Local Shire Council Accredited Rural Merchants (limited area)</td>
<td>Awaiting PAPP to be added to list of available chemicals by QLD Dept. of Health</td>
</tr>
<tr>
<td>SA</td>
<td>NRM Boards</td>
<td>11 August 2016</td>
</tr>
<tr>
<td>TAS</td>
<td>Not available</td>
<td></td>
</tr>
<tr>
<td>VIC</td>
<td>Accredited Rural Merchants</td>
<td>16 March 2016 (advice), 21 June 2016 (updated directions for use)</td>
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<tr>
<td>WA</td>
<td>Accredited Rural Merchants</td>
<td>Awaiting confirmation from WA government</td>
</tr>
</tbody>
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* As of 15 August 2016 based on advice from Animal Control Technologies Australia and IA CRC.